



Comisiwn **Seilwaith**
Cenedlaethol **Cymru**
National **Infrastructure**
Commission **Wales**

Ein cyf/Our ref: NICW/25/DC/PLC

Building Regulations Consultation
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17th November 2025

Dear Sir / Madam

Building Regulations Part L 2025 Review Changes to Part L (conservation of fuel and power), Part O (overheating) and Part F (ventilation) of the Building Regulations for dwellings and non-domestic buildings

The National Infrastructure Commission for Wales (NICW) welcomes the opportunity to respond to the Welsh Government's consultation on changes to Building Regulations, particularly as they relate to Part L (Conservation of fuel and power)

Our response focuses on the proposals for renewable energy generation and is grounded in the Commission's strategic vision for a resilient, low-carbon Wales, as set out in our 2023 report "[Preparing Wales for a Renewable Energy 2050](#)." This report outlines recommendations to assist the Welsh Government in achieving a net zero Wales by 2050 and provides a comprehensive framework for enhancing renewable energy development in Wales.

Our key recommendation requested that "*An immediate review of Part L of the Building Regulations is needed to mandate the use of renewable technologies (especially solar thermal and solar photovoltaics) and battery storage in all new developments, and in significant renovations or extensions.*"

In light of this NICW would like to respond specifically to Question 12 of the consultation:

Do you consider that a Part L requirement for renewable energy (with guidance given in Approved Document L) should be implemented rather than being included in the notional dwelling specification for new dwellings? Please explain your reasoning.

The consultation seeks to ascertain opinion if on-site renewable energy electricity generation should become a functional requirement in Building Regulations with guidance produced supporting a provision of 40% of the ground floor area of the dwelling. Dispensation against this arrangement could be given for reasons of design or surroundings.

Cadeirydd / Chair
Ddirprwy Gadeirydd / Deputy Chair

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NICW supports this approach and considers that it should be extended to non-domestic buildings as well as soon as possible.

NICW's support for this potential is based on policy rather than technical grounds. With planning policy and building regulations devolved since the inception of the Senedd, there is currently little to demonstrate that Welsh properties have been developed to a more sustainable, efficient and nature-friendly standard. The low cost of photovoltaic technologies means that they should now be considered as standard items in the toolbox to reduce ongoing energy costs for all new developments.

Wales has both climate change and renewable energy targets to consider. Every new home and building should be actively contributing to these targets to help mitigate against the impacts which we are already experiencing. In addition, the existence of integrated battery storage systems along with the renewable energy generation will have financial benefit for those residents / users of the building, further contributing to the social justification for this approach.

NICW notes the grounds for 'dispensation' around this requirement and would add a note of caution. NICW would not want new developments to be designed to purposely mean that solar panels or other renewable energy generation could not be installed onsite. Whilst NICW notes, in paragraph 2.41 of the consultation document of required evidence, we also suggest that the developers be also asked to share alternative design options which were considered that could have accommodate this request.

[Planning design guidance](#) already exists and developers should be encouraged to take this into account at the earliest opportunity so that when Building Regulations are considered, the renewable energy requirements and potential have already been assessed.

These potential changes are consistent with our recommendation and represent a meaningful step towards more enabling building regulations that supports the transition to net zero. We encourage the Welsh Government to continue to review the situation with ambition, clarity, and a commitment to increasing renewable energy production and tackling climate change.

We would be pleased to engage further with officials as the proposals are refined and implemented.

Yours faithfully,



Dr David Clubb
NICW Chair